

EXHIBIT B

FEDERAL PUBLIC DEFENDER

Middle District of Florida

R. Fletcher Peacock
Federal Public Defender

Reply to: Tampa

James T. Skuthan
Chief Assistant Federal Public Defender

May 6, 2005

Orlando:

Rosemary T. Cakmis
Clarence W. Counts, Jr.
George Couture
Craig L. Crawford
Peter Warren Kenny
Stephen J. Langs
Michelle P. Smith
Donald R. West

Walter Furr, Esq.
Cherie L. Krigsman, Esq.
Terry Zitek, Esq.
U.S. Attorney's Office
400 N. Tampa Street, Suite 3200
Tampa, FL 33602

BY HAND DELIVERY

Tampa:

Adam B. Allen
Kevin T. Beck
Tracy Dreispul
Dionja L. Dyer
Allison Guagliardo
Maria Guzman
A. Fitzgerald Hall
Mary Mills
Mark Rankin
Wadie Said
Andrea T. Stubbs
Frank Zarembo

Re: *United States v. Hatem Naji Fariz*
Case No.: 8:03-CR-77-T-30TBM (M.D. Fla.)

Dear Counsel:

Pursuant to Fed. R. Crim. Proc. 16(b), enclosed please find summaries of the testimony of our expert witnesses, Ilan Pappe and Raji Sourani.

Jacksonville:

Lynn Palmer Bailey
James H. Burke, Jr.
Lisa Call
Maurice C. Grant, II

Sincerely,



Wadie E. Said
Assistant Federal Public Defender

Ft. Myers:

Martin DerOvanesian
Darlene M. Geiger
Russell K. Rosenthal

cc: Stephen Bernstein, Esq.
Hatem Fariz
Bruce Howie, Esq.
William Moffitt, Esq.
Linda Moreno, Esq.

Ocala:

Rick Carey

ORLANDO DIVISION
Federal Building - Suite 417
80 North Hughey Avenue
Orlando, Florida 32801-2229
Telephone 407 648-6338
FAX 407 648-6095

TAMPA DIVISION
Park Tower - Suite 2700
400 North Tampa Street
Tampa, Florida 33602
Telephone 813 228-2715
FAX 813 228-2562

JACKSONVILLE DIVISION
Suite 1240
200 West Forsyth Street
Jacksonville, Florida 32202-4326
Telephone 904 232-3039
FAX 904 232-1937

FT. MYERS DIVISION
U.S. Courthouse - Rm. 2-146
2110 First Street
Ft. Myers, Florida 33901-3019
Telephone 239 461-2020
FAX 239 461-2025

OCALA DIVISION
Suite 102
201 S.W. Second Street
Ocala, Florida 34474
Telephone 352 351-9157
FAX 352 351-9162

Raji Sourani, the Director of the Palestinian Centre for Human Rights and a Commissioner with the International Commission of Jurists, will testify as to the legal and humanitarian situation of the Gaza Strip, the area in which he resides and practices law. Specifically, he will discuss the socioeconomic conditions in the Gaza Strip, as well as the restrictions put in place by the Israeli authorities on its residents.

Mr. Sourani will testify to the role charitable institutions play in the impoverished Gaza Strip and their relationship, if any, with political groups. His testimony will cover the process of how charitable groups register and are monitored by the Palestinian Authority and the Israeli authorities, and will remark on the charitable nature of the actual aid delivered by those groups. His testimony will demonstrate the critical role that charitable groups play in the lives of Gaza residents as a result of the lack of any significant governmental services and the general economic situation. Mr. Sourani will also testify to the nature of the relationship between a political group's military, political, and charitable wings. Further topics of relevant testimony include the significance, meaning, and usage of the terms "martyrs" and "detainees."

Mr. Sourani will testify to the nature and use of investigatory techniques and military courts by the Israeli authorities.

Finally, Mr. Sourani's testimony may also be called to directly rebut the testimony of the government's expert witness, Matthew A. Levitt, the extent of which cannot yet be fully determined.

Ilan Pappé, a professor of modern Middle East history at the University of Haifa, will testify to the history of the Palestinian-Israeli conflict through its various phases, including, *inter alia*, a discussion of the creation of the state of Israel in 1948, the status of the Palestinian Arabs within and without Israel from 1948-1967, the 1967 Arab-Israeli war and the subsequent occupation of the West Bank and Gaza Strip, the first and second Intifadas, and the 1993 Oslo Accords, all of which are referenced in the allegations in the Superseding Indictment. Prof. Pappé will also testify to the history of the formation of the Palestinian Islamic Jihad and the context in which it was formed and operated, including a discussion of the use of violence by the PIJ to counter the measures of Israeli authorities. He will also testify to the importance and background of figures associated with the PIJ, including Izzeddine Al-Qassam, Fathi Shiqaqi, Abd Al-Aziz Awda, and Ramadan Shallah. Further topics of relevant testimony include the significance, meaning, and usage of the terms "martyrs" and "detainees."

Prof. Pappé may also rebut the government's theory and allegations of extortion as pled in the Superseding Indictment, by discussing the nature of land ownership in Israel.

Finally, Prof. Pappé's testimony may also be called to directly rebut the testimony of the government's expert witness, Matthew A. Levitt, the extent of which cannot yet be fully determined.